

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

2020 SEP 22 P 2:20

CLERK OF COURT

20-C-1482

Barry Smith,

And

Francillya Blake,

Plaintiffs,

V.

Community Care, Inc.,

And

Guardiantrac LLC, dba GT Independence,

Defendants.

CIVIL COMPLAINT

This complaint is based on the federal Fair Labor Standards Act.

First cause of action: Plaintiff, Barry Smith, has been employed by defendants, Community Care Inc., and Guardiantrac LLC, dba GT Independence, for over three years as a non-licensed skilled home health care provider. During the past three years, September of 2017 through September of 2020, a period of thirty six months, defendants have willfully failed to pay, and

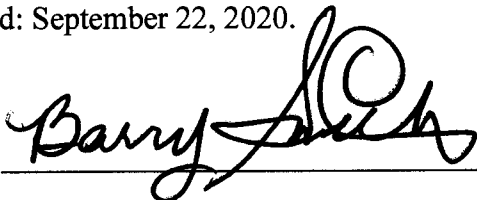
recklessly disregarded plaintiff's right to be paid the wages and overtime pay he has earned for a total of, exactly or about, twelve months. Defendants owe plaintiff, exactly or about, twelve months of unpaid wages and overtime pay.

Second cause of action: Plaintiff, Francillya Blake, has been employed by defendants, Community Care Inc., and Guardiantrac LLC, dba GT Independence, for over one year as a home health aide. During the past year, August of 2019 through September of 2020, a period of thirteen months, defendants have willfully failed to pay and recklessly disregarded plaintiff's right to be paid the wages and overtime pay she has earned for a total of, exactly or about, five months.

Plaintiffs demand trial by jury.

Relief requested: Plaintiffs seek the wages and overtime pay owed to them by defendants, and plaintiffs seek liquidated damages and attorney fees as provided by the Fair Labor Standards Act.

Dated: September 22, 2020.

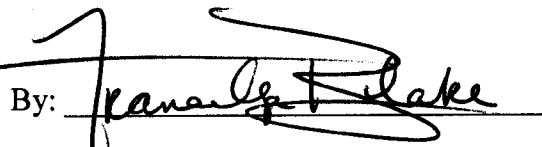
By: 

Barry Smith

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By: 

Francillya Blake

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